

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
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Third Periodic Review of the)	MB Docket No. 0791
Commission's Rules and Policies)	
Affecting the Conversion)	
To Digital Television)	
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COMMENTS OF THE ADVANCED TELEVISION SYSTEMS COMMITTEE, INC.

The Advanced Television Systems Committee, Inc. (ATSC) hereby submits these comments on the Commission's Notice of Proposed Rule Making in the proceeding noted above dealing with the Commission's review of its rules and policies affecting the conversion to digital television (DTV) in the United States.¹ The ATSC's comments on the Notice are limited to section G, in which the Commission seeks comment on issues related to ATSC Standards.

¹ The Advanced Television Systems Committee, Inc. is an international, non-profit organization developing voluntary standards for the entire range of advanced television systems. The ATSC has approximately 145 member organizations representing the broadcast, broadcast equipment, motion picture, consumer electronics, computer, cable, satellite, semiconductor and automotive industries. The

We agree with the Commission's view that further improvements to DTV standards should be encouraged. The ATSC has continued to evolve and improve our existing standards. We applaud the Commission's decision to revise its rules to adopt the most recent version of the ATSC DTV and PSIP Standards.

DTV Transmission Standard (ATSC A/53)

The Commission should note that the DTV Standard (A/53) has been revised beyond Revision E, with Amendments 1 & 2 cited in the Notice². In an effort to facilitate future changes and enhancements to the standard, ATSC has partitioned the DTV Standard into to six parts:

A/53, Part 1:2007, "Digital Television System"

A/53, Part 2:2007, "RF/Transmission System Characteristics"

A/53, Part3:2007, "Service Multiplex and Transport Subsystem Characteristics"

A/53, Part 4:2007, "MPEG-2 Video System Characteristics"

A/53, Part 5:2007, "AC-3 Audio System Characteristics"

A/53, Part 6:2007, "Enhanced AC-3 Audio System Characteristics"

The new restructured standard was a major editorial undertaking, with no significant substantive changes from the previous version. Partitioning of the DTV Standard facilitates revision of one Part to be made without impacting the entire standard. Additional Parts may be added in the future to define new enhancements to the DTV system. We strongly urge the Commission to revise its rules to reference the current

ATSC developed the ATSC Digital Television Standard, most of which the Commission adopted as its DTV broadcast standard in 1996.

² Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television , Section 220, P. 48

version of the DTV Standard as described above. The DTV standard, Part 1 through 6 is available at <http://www.atsc.org/standards/a53.html>.

Program System and Information Protocol (PSIP) Standard (ATSC A/65)

We appreciate the Commission's understanding of the importance of PSIP and concur with its proposal to revise the rules to reference to the current version. In this regard, we suggest that the Commission revise its rules to reference A/65C Program and System Information Protocol for Terrestrial Broadcast and Cable, Revision C (2 January 2006), with Amendment No. 1 (9 May 2006)³ which can be found at <http://www.atsc.org/standards/a65.html> .

Ongoing Work of the ATSC

One of the great benefits of the U.S. digital television system is the ability to enhance and extend its capabilities. The ATSC has a number of projects underway that will add new functionality to the DTV standard. These efforts include a new mode known as ATSC-M/H that will enable broadcasters to deliver television content and data to mobile and handheld devices via their DTV broadcast signal. ATSC-M/H will be backwards compatible, allowing operation of existing ATSC services in the same RF channel without an adverse impact on existing receiving equipment. Broadcasters will be able to allocate a portion of their 19.39 Mbps/8-VSB signal to mobile and handheld while continuing to transmit services such as HDTV. ATSC is also in the process of considering the

³ Amendment 1 describes changes to A/65C to add PSIP support for delivery of data when utilizing the Enhanced VSB (E-VSB) mode.

requirements for "ATSC 2.0", which will be a complete suite of next generation services for the conventional fixed DTV receiver viewing environment.

In summary, the ATSC urges the Commission to revise its rules to reference the current version of ATSC Standards: A/53, ATSC Digital Television Standard, Parts 1 - 6, 2007 and A/65C, Program and System Information Protocol for Terrestrial Broadcast and Cable, Revision C, with Amendment No. 1. The ATSC continues to add new capabilities to the DTV Standards and we look forward to working with the Commission to ensure that the nations digital broadcast television system can quickly begin using these new technologies to provide a broad array of services for the American people.

Respectfully submitted,

The Advanced Television Systems Committee



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